ENVIRON Corporation
Counsel in Health and Environmental Science

December 18, 1986

Hand Deliver

Mr. Mike Surowiec
Bureau of Industrial Site Evaluation
Division of Waste Management
New Jersey Department of Environmental
Protection
401 East State Street, 5th Floor
Trenton, NJ 08625

Re: Hexcel Corporation - Industrial Chemicals Group
205 Main Street - Lodi Borough, Bergen County
ECRA Case No. 86009

Dear Mike:

The following is an addendum to our letter of October 20, 1986 and provides additional information which has since been obtained through further examination and testing of drain systems on the property. This letter and our earlier letter address the request for information in the letter from Joseph R. Fallon and your accompanying Report of Inspection for the former Hexcel Corporation facility in Lodi, New Jersey.

9/15/86

Item 6 of Mr. Fallon's letter:

Item 6: Provide specifications on the construction of the recovery well and information on the latest cleaning of the casing of the production well.

Response: Production well information has been previously provided. Recovery well specifications have been provided by Warren George Drilling and are included as Attachment 1.

The following information addresses the "Actions Required on the Part of the Applicant" specified in the Report of Inspection:

Item 1: Provide original blue prints (where possible) of all sewer line piping and catch basins as well as documentation of their age and construction detail.

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Storm, industrial, and sanitary lines as well as distribution of roof drains should be clearly distinguished. Where blueprints are not available a detailed evaluation of floor drain piping (in Buildings 11, 12, and 1) should be conducted using smoke and dye tests. All results should be reported on an enlarged site plan of each building.

Response: The drainage and internal sewer system has been dye and smoke tested. The drain and internal sewer system has been depicted on a site plan (see Attachment 2). The testing of the drain system was inconclusive with respect to the outfall from two drains. First, catch basin no. 2, which is located in the alleyway outside Building 11, is drained by a 6 inch clay pipe, which according to archive records connects to a sump (no. 1) in Building 11. Dye testing at catch basin no. 2 did not demonstrate this connection. Further efforts to clear the drain pipe of any obstruction and to complete the testing and documentation of its point of outfall will continue. We would expect to provide additional information to you in this regard by mid-January, 1987. Second, a drain hole in the floor at the rear of Building 11 was dye tested, but results were inconclusive regarding its outfall. Further information on this issue is presented below in item no. 11.

Item 2: Identify the purpose of the pit and check for cracks and leaks and determine if it is connected to the drainage network (verify with photograph). Determine the composition of the fluid. If hazardous constituents are identified in the fluid, and if the unit is found to be leaking, it will have to be addressed in an addendum to the Sampling Plan.

Response: Attachment 3 provides photographic documentation of the integrity of the pit. A visual inspection of the pit after removal of the accumulated rain water revealed that it is not connected to any drainage network. There appear to be no cracks or breaks in the concrete and inspection of the pit did not reveal any other deterioration.

Item 3: Identify the ultimate discharge location of runoff entering the sewer grate. Visually inspect the catch basin for cracks and leaks and verify its integrity with a photograph. If leaks are found the unit may have to be addressed in an addendum to the Sampling Plan.

Response: Discharge from the catch basin for water entering the "sewer grate" is to catch basin no. 2. Photographs of the catch basin are included as Attachment 4. This grate is located in an area (AEC 4) which will undergo soil and ground water sampling pursuant to the Sampling Plan. Rehabilitation of the catch basin will be considered as part of the remedial design plan for the site.

Item 8: The catch basin should be inspected for integrity (verified by photograph). Its ultimate discharge point(s) and all inflow and outflow pipes should be clearly identified on a site map. If leaks are found the unit must be addressed in an addendum to the Sampling Plan.

Response: Inflows and outflows for the storm water catch basin are identified in Attachment 2. Because the catch basin receives discharges from the other catch basins on-site and is in constant use, it cannot be emptied and examined for leaks and cracks without re-routing the sewer system. Therefore, appropriate soil sampling around the catch basin to evaluate its integrity will be proposed in an Addendum to the Sampling Plan.

Item 10: Provide details on the dimensions of the shaft pit and verify its integrity (cracks, drains, etc.) with a photograph.

Response: The elevator shaft is 55" x 67" x 12". There is no drain and water is removed by a pump. Photographs are included in Attachment 5.

Item 11: Identify the purpose of the hole.

Response: The dye testing of the hole in the floor of Building 11 was inconclusive. This drain is not shown in any archive records and the point of discharge is unknown. The hole has been reported to be used to drain steam condensate. The hole appears to drain toward the rear of Building 11 into an area (AEC 6) which is proposed to be tested by soil borings and monitoring wells. This testing should demonstrate if any environmental releases occurred through the drain hole, and no additional direct testing of this hole by dye or tracers is anticipated at this time. A temporary plug will be installed to prevent any further discharge until such time as it is appropriate to permanently plug and seal the hole.

Item 13: Identify the purpose of the drains and provide information on the routing of piping as in Item 1 above.

Response: All drain locations and routings are depicted in Attachment 2.

Additional Information on the Drain System

During the further inspection and dye testing of the drain system, oil was discovered to be floating on the water surface in manhole no. 1, which is located in the rear lot behind Building 1 and is part of the industrial sewer system. The source of this floating oil is unknown at present. The floating oil will be removed from the manhole and retained on-site in a sealed drum pending chemical testing. When chemical tests on this oil are complete, a final decision will be made regarding its disposal. We anticipate being able to provide you further information on this by mid-February, 1987.

The information in this letter, and our earlier letter of October 20, 1986, responds to your earlier requests of additional information to the extent that archive records are available. Pending your approval of the Sampling Plan we will continue to investigate the outfall from catch basin no. 2 and the nature and source of oil in manhole no. 1 as described above. We will provide additional information to you on these issues as it becomes available.

Sincerely,

Robert Powell

Robert Powell, Ph.D.
Project Manager

Arthur W. Bozza

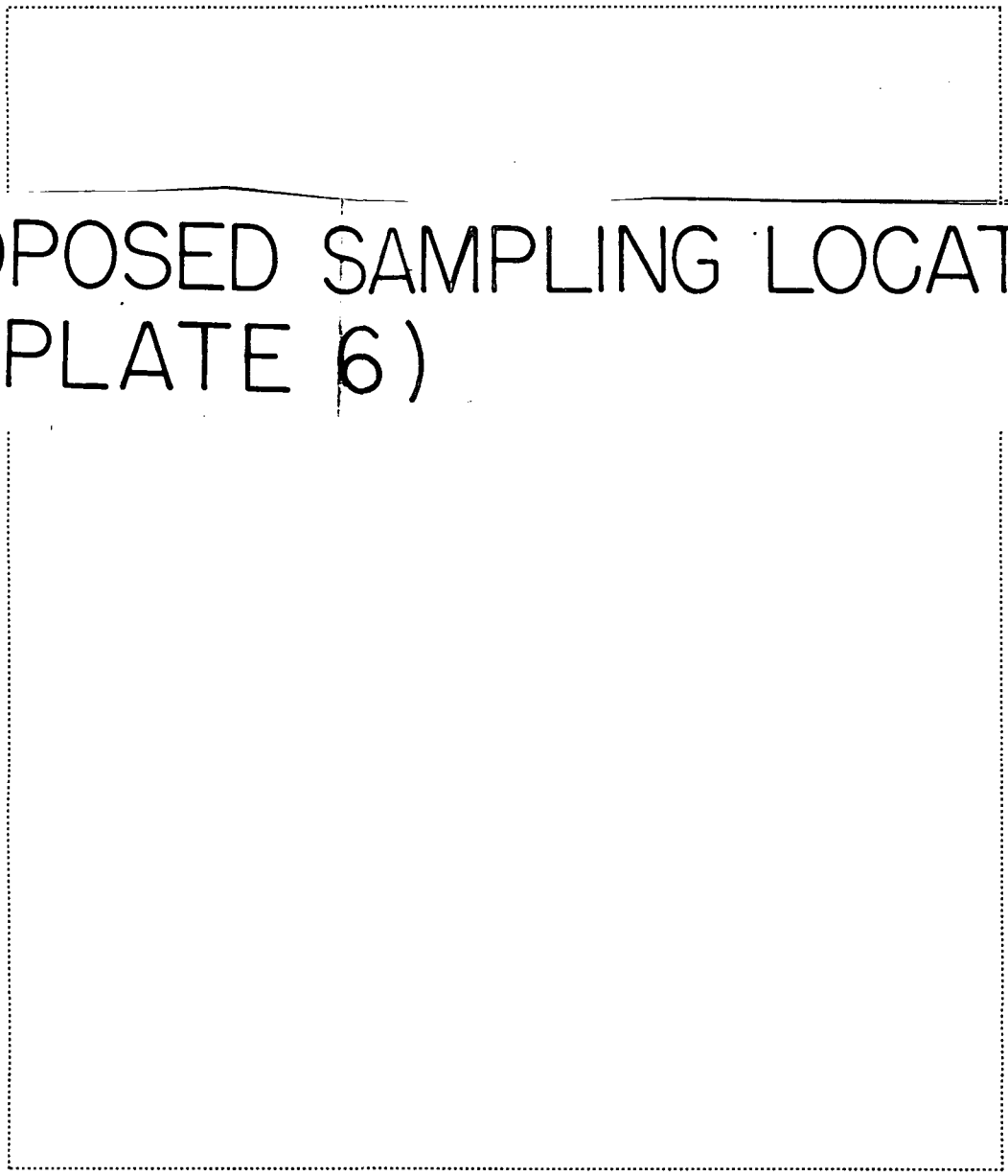
Arthur W. Bozza
Staff Scientist

RP/AB:cd
Attachments

ATTACHMENT 1

NOTICE ABOUT OVERSIZED MAP

THIS MAP IS AN OVERSIZED DOCUMENT. IT IS AVAILABLE FOR REVIEW AT THE U.S. EPA SUPERFUND RECORDS CENTER, 290 BROADWAY, 18TH FLOOR, NEW YORK, NY 10007
PHONE: (212) 637-4308.



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